

GARMAN TURNER GORDON LLP
ERIKA PIKE TURNER
Nevada Bar No. 6454
Email: eturner@gtg.legal
7251 Amigo Street, Suite 210
Las Vegas, Nevada 89119
Tel: (725) 777-3000
Fax: (725) 777-3112

SEYFARTH SHAW LLP
JEREMY A. COHEN
(Pro Hac Vice)
Email: JACohen@seyfarth.com
620 Eighth Avenue
New York, New York 10018
Tel: (212) 218-5500

Attorneys for Defendant, Eastern Airlines, LLC

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

TEAM 125, INC., a Delaware corporation,

Plaintiff,

v.

EASTERN AIRLINES, LLC a Nevada
limited liability company; and DOES 1
through 20, and ROE ENTITIES 1-20,
inclusive,

Defendant.

CASE NO.: 2:21-cv-00520-KJD-NJK

**STIPULATION FOR EXTENSION OF
TIME TO FILE MOTION FOR
ATTORNEYS' FEES AND BILL OF
COSTS**

(SECOND REQUEST)

Defendant Eastern Airlines, LLC ("Defendant") and Plaintiff Team 125, Inc. ("Plaintiff," and together with Defendant, the "Parties"), through their respective undersigned counsel, hereby stipulate and request that this Court extend the date by which Defendant may file a Motion for Attorneys' Fees and Bill of Costs.

In support of this Stipulation, the Parties state as follows:

1. On March 23, 2023, the Court granted Defendant's Motion for Sanctions [ECF No. 43].
2. On April 4, 2023, Court granted Stipulation for Extension of Time to File Motion for Attorneys' Fees and Bill of Costs [ECF No. 45] extending the date by which

Defendant must file Motion for Attorneys' Fees and Bill of Costs from April 6, 2023 to April 20, 2023.

3. Counsel for the Parties have further conferred and agreed to extend the date by which Defendant must file Motion for Attorneys' Fees and Bill of Costs from April 20, 2023 to May 4, 2023.

4. The Parties are still hopeful they are going to resolve the fees issue without needing to file a Motion for Attorneys' Fees and Bill of Costs but once again need additional time to confer.

IT IS SO STIPULATED.

Dated this 19th day of April 2023.

Respectfully submitted,

GARMAN TURNER GORDON LLP

/s/ Erika Pike Turner

ERIKA PIKE TURNER
Nevada Bar No. 6454
7251 Amigo Street, Suite 210
Las Vegas, Nevada 89119
Attorneys for Defendant, Eastern Airlines, LLC

Dated this 19th day of April 2023.

Respectfully submitted,

GREENSPOON MARDER LLP

/s/ Phillip A. Silvestri

PHILLIP A. SILVESTRI
Nevada Bar No. 11276
3993 Howard Hughes Parkway, Ste. 400
Las Vegas, Nevada 89169
Attorneys for Plaintiff, Team 125, Inc.

IT IS SO ORDERED:


UNITED STATES DISTRICT COURT JUDGE

DATED: May 23, 2023